

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

T.F. by his next friend Tracy Keller; K.D. by his next friend Laura Ferenci; C.O. by her next friend Laura Ferenci; L.L. by his next friend Gerald Kegler; T.T. and M.T. by their next friend Dr. Caryn Zembrosky; T.M., T.E., and A.T. by their next friend James Dorsey; A.W. and J.W. by their next friend Margaret Shulman, and I.W., D.W., and B.W by their next friend Gloria Anderson, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

Hennepin County; Hennepin County Department of Human Services and Public Health; David J. Hough, Hennepin County Administrator; Jennifer DeCubellis, Hennepin County Deputy Administrator for Health and Human Services; Jodi Wentland, Hennepin County Director of Human Services; Janine Moore, Director, Hennepin County Child and Family Services; and Tony Lourey, Commissioner, Minnesota Department of Human Services,

Defendants.

Civil No. 0:17-cv-01826-PAM-BRT

**STIPULATION TO SUSPENSION OF
LITIGATION DEADLINES**

WHEREAS the parties to this action have executed a Stipulation and Settlement Agreement, which will resolve and settle all disputed claims among them;

WHEREAS the parties intend to submit the Stipulation and Settlement Agreement to the Court seeking preliminary and final approval under Fed. R. Civ. P. 23(e); and

WHEREAS the parties have agreed that all litigation deadlines should be suspended pending the Court's decision on approval of the settlement.

Accordingly, Plaintiffs and Defendants stipulate and respectfully request that the Court enter an Order suspending all litigation deadlines, pending the Court's decision on preliminary and final approval of the proposed settlement.

Dated: July 11, 2019

FAEGRE BAKER DANIELS LLP

s/ James L. Volling

James L. Volling, MN Atty #113128

James.Volling@FaegreBD.com

Larry E. LaTarte, MN Atty #0397782

Larry.LaTarte@FaegreBD.com

Nathaniel J. Zylstra, MN Atty #0314328

Nathaniel.Zylstra@FaegreBD.com

Nicholas J. Nelson, MN Atty #0391984

Nicholas.Nelson@FaegreBD.com

Jeffrey P. Justman, MN Atty #0390413

Jeff.Justman@FaegreBD.com

Laura Reilly, MN Atty #0397655

Laura.Reilly@FaegreBD.com

2200 Wells Fargo Center

90 South Seventh Street

Minneapolis, MN 55402-3901

Telephone: (612) 766-7000

A BETTER CHILDHOOD, INC.

Marcia Robinson Lowry (admitted *pro hac vice*)

mlowry@abetterchildhood.org

Sarah Jaffe (admitted *pro hac vice*)

sjaffe@abetterchildhood.org

355 Lexington Ave., 16th Floor

New York, New York 10017

CUTI HECKER WANG LLP
Eric Hecker (admitted *pro hac vice*)
hecker@chwllp.com
305 Broadway
New York, New York 10007
Attorneys for Plaintiffs

Dated: July 11, 2019

**OFFICE OF THE ATTORNEY
GENERAL
State of Minnesota**

s/ Jason Marisam

Janine Kimble, MN Atty #0392032
janine.kimble@ag.state.mn.us
Jason Marisam, MN Atty #0398187
jason.marisam@ag.state.mn.us
Assistant Attorneys General
445 Minnesota Street, Suite 1100
St. Paul, MN 55101-2128
(651) 757-1243

**ATTORNEYS FOR DEFENDANT
TONY LOUREY**

Dated: July 11, 2019

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

s/ Charles N. Nauen

Charles N. Nauen, MN Atty #121216

cnnauen@locklaw.com

David J. Zoll, MN Atty #0330681

djzoll@locklaw.com

Brian D. Clark, MN Atty #0390069

bdclark@locklaw.com

Rachel A. Kitze Collins, MN Atty #0396555

rakitzeollins@locklaw.com

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

(651) 339-6900

Michael O. Freeman, MN Atty #0031860

michael.freeman@hennepin.us

Daniel P. Rogan, MN Atty #0274458

daniel.rogan@hennepin.us

HENNEPIN COUNTY ATTORNEY'S OFFICE

C-2000 Government Center

300 South Sixth Street

Minneapolis, MN 55487

(612) 348-5550

**ATTORNEYS FOR DEFENDANTS
HENNEPIN COUNTY; HENNEPIN
COUNTY DEPARTMENT OF HUMAN
SERVICES AND PUBLIC HEALTH, DAVID
J. HOUGH, JENNIFER DeCUBELLIS, JODI
WENTLAND, AND JANINE MOORE**